

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

Tango Marine S.A.,	§	
	§	
Plaintiff,	§	
	§	CIVIL ACTION NO.: 20-cv-42-A
v.	§	
	§	IN ADMIRALTY, Rule 9(h)
Elephant Group Limited, et al.,	§	
	§	
Defendants and Garnishees.	§	

**PLAINTIFF TANGO MARINE S.A.'S
MOTION FOR DEFAULT JUDGMENT AGAINST
DEFENDANTS ELEPHANT GROUP LIMITED AND ELEPHANT GROUP PLC**

Pursuant to Federal Rule of Civil Procedure 55(b)(2), Plaintiff Tango Marine S.A. (“Tango”) moves for a default judgment, jointly and severally, against Defendants Elephant Group Limited and Elephant Group PLC (collectively, “Elephant Group”) in the amount of **\$4,473,167.50**.

As set forth in the accompanying Affidavit of the Director of Tango, Elpida Hatjioannou, and Memorandum of Law, the conditions of Rule 55(b) have been satisfied and entry of default judgment is proper as a matter of law.

Dated: July 1, 2020.

Respectfully submitted,

/s/ J. Stephen Simms

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